

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION : HON. ROBERT B. KUGLER
Civil No. 19-2875 (RBK/JS)
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ORDER

AND NOW, this _____ day of _____, ____ 20 / 21, after consideration of the Aurobindo Defendants' and Torrent Defendants' Motion for a Protective Order directed to Alceme Corporation, AXIS Clinicals, Catalent, Gibralter Laboratories, Inc., Medical Affairs Company, Meridian Consulting, Novartis Pharmaceutical, Peritt Laboratories, Rising Pharmaceuticals, SDS Environmental Services, ToxRox Consulting, LLC, and any response in opposition thereto, it is hereby **ORDERED** and **DECreed** that said Motion is granted. It is further **ORDERED** that:

1. All subpoenas seek information beyond the Scope of Discovery as provided by Federal Rule of Civil Procedure 26(b)(1).
2. All Subpoenas seek information beyond the Scope of Discovery as limited by this Court's previous Order regarding Confidentiality and Macro Discovery.
3. A Protective Order is hereby entered and shall be followed accordingly:
 - Defendants are permitted to examine all responses, including documents, communications, etc. received from the Third Parties in response to the subpoenas prior to plaintiffs' receipt.
 - No later than forty-five (45) days after the receipt of the documents in response to the subpoenas, Defendants shall produce all documents, communications, etc. not subject to this Court's Orders regarding Confidentiality and Macro Discovery. Additionally, defendant shall examine the contents and shall produce a privilege log of all documents withheld from production on the basis of the attorney-client privilege, the work product doctrine, as well as documents that contain proprietary information and otherwise related to trade secrets.

J. Schneider